West River Cooperative Telephone Company

801 Coleman Ave ● PO Box 39 ● Bison, SD 57620
Phone: 605-244-5213 ● Fax: 605-244-7288
Email: westriver@sdplains.com

NETWORK MANAGEMENT POLICY

West River Cooperative Telephone Company, Inc. ("West River Coop" or "Company") provides this Network Transparency Statement in accordance with the FCC's Restore Internet Freedom Rules to ensure that you have sufficient information to make informed choices about the purchase of broadband services. Information about West River Coop's other policies and practices concerning broadband are available at http://www.sdplains.com ("West River Coop Website").

West River Coop engages in network management practices that are tailored and appropriate for achieving optimization on the network considering the particular network architecture and technology of its broadband Internet access service. West River Coop's goal is to ensure that all of its customers experience a safe and secure broadband Internet environment that is fast, reliable, and affordable. West River Coop wants its customers to indulge in all that the Internet has to offer, whether it is social networking, streaming videos, and music, to communicating through email and videoconferencing.

West River Coop will not unjustly or unreasonably prevent or interfere with competition among Content, Applications, Service, or Device Providers.

West River Coop's network management includes congestion- and security-protocol-management and customers generally will not be impacted by the protocols and practices that West River Coop uses to manage its network.

West River Coop provides spam filtering with each customer's "sdplains.com" email address. Details of this service are listed on West River Cooperative Telephone Company, Inc.'s website. West River Coop will not ask you for your password in an unsolicited telephone call or email. If you believe your password has been compromised, you should immediately change your password to prevent the unauthorized use of it.

A. West River Coop's Network Transparency Disclosures

West River Coop uses various tools and industry standard techniques to manage its network and deliver fast, secure and reliable Internet service. West River Coop believes in full transparency and provides the following disclosures about its network management practices:

1. **Blocking:** West River Coop does not block or discriminate against lawful content.

2. **Throttling:** West River Coop does not throttle, impair or degrade lawful Internet traffic.

3. **Affiliated Prioritization:** West River Coop does not prioritize Internet traffic and has no plans to do so.

4. **Paid Prioritization:** West River Coop has never engaged in paid prioritization. We don't prioritize Internet for consideration to benefit particular content, applications, services or devices. West River Coop does not have plans to enter into paid prioritization deals to create fast lanes.

5. **Congestion Management:** West River Coop monitors the connections on its network in the aggregate on a continuous basis to determine the rate of utilization. If congestion emerges on the network, West River Coop will take the appropriate measures to relieve congestion.

   On West River Coop's network, all customers have access to all legal services, applications and content online and, in the event of congestion, most Internet activities will be unaffected. Some customers, however, may experience longer download or upload times, or slower surf speeds on the web if instances of congestion do occur on West River Coop's network.

   Customers using conduct that abuses or threatens the West River Coop network or which violates the company's Acceptable Use Policy, or the company's Internet Policy will be asked to stop any such use immediately.   A failure to respond or to cease any such conduct could result in service suspension or termination.

   Customers using conduct that abuses or threatens the company's Digital Millennium Copyright Act (DMCA) Policy will be subject to the actions within the company's DCMA Policy.

   West River Coop's network and congestion management practices are 'application-agnostic', based on current network conditions, and are not implemented on the basis of customers' online activities, protocols, or applications. West River Coop's network management practices do not relate to any particular customer's aggregate monthly data usage.

West River Coop monitors its network on a continuous basis to determine utilization on its network. West River Coop also checks for abnormal traffic flows, malware, loss, and damage to the network. If a high volume users are brought to light by complaint, West River Coop provides notification to the customer via email or phone. If a violation of West River Coop's policies has occurred and such violation is not remedied, West River Coop will seek to suspend or terminate that customer's service.

West River Coop monitors its connection to the internet to efficiently manage the performance of the network to ensure a sustainable quality broadband service is provided. Peak network usage is between 4 pm and 11 pm Monday – Friday and 10 am – 11 pm Saturday and Sunday.

Congestion due to malice will be remedied using any technique available, including protocol-aware filtering and rate-limiting, to control and limit the offending source. West River Coop may seek criminal charges against those who inflict network malice. West River Coop may also attempt to recover costs incurred from network malice.

6. **Application-Specific Behavior:** Except as may be provided elsewhere herein, West River Coop does not currently engage in any application-specific behaviors on its network. Customers may use any lawful applications with West River Coop.

7. **Device Attachment Rules:** Customers must use PPPoE for authentication of point to point connections between devices on the network. There is a limit of one (1) PPPoE session per account. For best results, DSL modems, wireless modems, or other proprietary network gateways used on the West River Coop broadband network may be offered by West River Coop. Customers may attach devices of their choosing to their wired or wireless routers including laptops, desktop computers, video game systems, televisions, or other network-enabled electronics equipment. However, *customers* are responsible for ensuring that their equipment does not harm West River Coop's network or impair the service of other West River Coop customers. West River Coop is not responsible for the functionality or compatibility of any equipment provided by its customers. Customers are responsible for securing their own equipment to prevent unauthorized access to West River Coop's broadband network by third parties and will be held responsible for the actions of such third parties who gain unauthorized access through unsecured customer equipment.

8. **Network Security:** West River Coop knows the importance of securing its network and customers from network threats and annoyances. The company promotes the security of its network and patrons by protections from such threats as spam, viruses, firewall issues, and phishing schemes. West River Coop subscribes to DDOS protection from our upstream ISP. In the event that we have a high level of ingress

or egress traffic flows that could be causing a DDOS attack, our DDOS protection blocks the traffic from or to those IP addresses.

As its normal practice, West River Coop does not block any protocols, content or traffic for purposes of network management, but West River Coop may block or limit such traffic as spam, viruses, malware, or denial of service attacks to protect network integrity and the security of our customers.

B. Network Performance

1. Service Descriptions

West River Coop deploys Internet access to its subscribers through hardwired broadband access via FTTH and FITL applications and facilities.

2. Network Performance

West River Coop makes every effort to support advertised speeds and will dispatch repair technicians to customer sites to perform speed tests as needed to troubleshoot and resolve speed and application performance problems. West River Coop measures availability, latency, and aggregate utilization on the network and strives to meet internal service level targets.

However, the bandwidth speed at which a particular distant website or other Internet resources may be downloaded, or the speed at which your customer information may be uploaded to a distant website or Internet location is affected by factors beyond West River Coop's control, including the speed of the connection from a distant web server to the Internet, congestion on intermediate networks, and/or limitations on your own private network, such as computer equipment or wireless routers. In addition, your service performance may be affected by the inside wiring at your premise. Accordingly, you, the customer, must consider the capabilities of your own equipment when choosing a West River Coop broadband service. Your computers and/or wireless or other networks in your homes or offices may need an upgrade in order to take full advantage of the chosen West River Coop broadband plan.

West River Coop tests each service for actual and expected access speeds at the time of network installation to demonstrate that the service is capable of supporting the advertised speed.
Customers may also test their actual speeds using the speed test located at
http://www.sdplains.com on West River Coop's website and may request assistance by calling our business office at 605-244-5213 or by email at westriver@sdplains.com.

Based on the network information West River Coop receives from its monitoring efforts, West River Coop's network is delivering data transmission rates advertised for the different high-speed Internet services. To be sure, West River Coop has implemented a program that consists of the periodic testing of its network by using an internet speed test in various parts of its

network. West River Coop has installed specific network monitoring equipment that monitors specific aggregation points across our network to help prevent points of congestion on the network. West River Coop reports the results of this speed and latency testing below. This result applies to both upload and download data rates, and applies for measurements made both at peak times and over a 24-hour period:

DOWNLOAD & UPLOAD SPEEDS, LATENCY

Download Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL	LATENCY
100 Mbps	102 Mbps	+2%	23ms
150 Mbps	152 Mbps	+1%	23ms
250 Mbps	252 Mbps	+1%	23ms

Upload Speeds

ADVERTISED	ACTUAL SUSTAINED	PERCENTAGE DIFFERENTIAL	LATENCY
100 Mbps	102 Mbps	+2%	23ms
150 Mbps	152 Mbps	+1%	23ms
250 Mbps	252 Mbps	+1%	23ms

Latency

SPEED TIER	LATENCY (PEAK TIMES)	LATENCY (OFF-PEAK TIMES)
100/100 Mbps	23ms	23ms
150/150 Mbps	23ms	23ms
250/250 Mbps	23ms	23ms

3. **Impact of Non-BIAS Data Services**

The FCC has defined Non-Broadband Internet Access Services (Non-BIAS) to include services offered by broadband providers that share capacity with Broadband Internet Access Services (BIAS) (previously known as "Specialized Services") also offered by the provider over the last-mile facilities.

West River Coop offers IP video service to end-users. Generally, this non-BIAS data service does not adversely affect the last-mile capacity available for the Company's broadband Internet access services, or the performance of such services. Customers should note, however, that

significantly heavier use of non-BIAS services (particularly IP video services) may impact the available capacity for and/or the performance of its broadband Internet access services. The Company will monitor this situation, and appreciates feedback from its customers.

C. Commercial Terms

Pricing and additional service information may be found here.

In order to meet the usage and budgetary needs of all of our customers, West River Coop offers a good selection of broadband internet access plan options. To see the Company's current promotions and pricing on Broadband Internet Access Service, please visit our website at "Bundles" (https://sdplains.com/bundles-2/), "Broadband Only" (https://sdplains.com/broadband-only/), "McIntosh Only" (https://sdplains.com/mcintosh/), which includes Broadband Labels for each of our broadband internet access offerings, or call 605-244-5213 to speak with a customer service representative. West River Coop's internet service is priced on a flat-fee basis (plus taxes). The Company does not charge end users a usage-based fee for such services. The information on our current Broadband Labels is also available in a "machine readable" spreadsheet form here.

In addition to this Network Transparency Statement, patrons may also find links to the following on the West River Coop Website:

- Customer Privacy Policy
- Network Management Frequently Asked Questions ("FAQs")
- Acceptable Use Policy for Broadband Services
- Digital Millenium Copyright Act (DCMA) Policy
- Customer Agreement

For questions, complaints or requests for additional information, please contact West River Cooperative Telephone Company, Inc. at:

Business Office at 605-244-5213
Email at westriver@sdplains.com